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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

12 \*\*\*

13 JIMMY JIHO PARK, an individual;

14 Plaintiff,

15 vs.

16 GEICO ADVANTAGE INSURANCE  
COMPANY., a Maryland Corporation; DOES  
17 I through XV, and ROE CORPORATIONS I  
through X, inclusive,

18 Defendants.  
19

CASE NO.: 2:20-cv-1343-JCM-EJY

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE A  
RESPONSE TO DEFENDANT'S MOTION  
TO DISMISS AND MOTION TO  
BIFURCATE AND STAY SECOND,  
THIRD AND FOURTH CAUSES OF  
ACTION (ECF No. 5 & 6)**

**(SECOND REQUEST)**

20 The parties, by and through their undersigned counsel of record, hereby stipulate and agree  
21 that the time for Plaintiff Jimmy Jiho Park ("Mr. Park" or "Plaintiff") to file his response to  
22 Defendant's Motion to Bifurcate and Defendant's Motion to Dismiss, said responses being due on  
23 August 25, 2020, be extended until **September 1, 2020**.

24 **Reason for Extension**

25 Because of the cases recent removal to Federal Court, and Plaintiffs' Counsel and  
26 Defendants' counsel discussions regarding a potential resolution to the subject Motion, along with  
27 the complexity and potential dispositive effects of Defendant's Motions, Plaintiff requires additional  
28 time to perform a full analysis and respond accordingly. A brief extension will provide Mr. Park

1 and his counsel sufficient time to prepare an appropriate response. This stipulation is made in good  
2 faith and not for the purpose of delay.

3 This is the second extension of time requested by counsel for filing Plaintiff's response to  
4 Defendant's Motion to Bifurcate and Motion to Dismiss.

5 DATED this 25<sup>th</sup> day of August, 2020.

DATED this 25<sup>th</sup> day of August, 2020.

6 LEWIS BRISBOIS BISGAARD & SMITH

V3 LAW LLC

7  
8 /s/ Cheryl A. Grames

/s/ Jose E. Valenzuela III

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12 *Attorneys for Defendant*

13  
14  
15 **ORDER**

16 IT IS SO ORDERED.

17 Dated September 1, 2020.

18  
19   
20 U.S. DISTRICT COURT JUDGE  
21  
22  
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28

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that on the 25th day of August, 2020, I electronically transmitted the foregoing STIPULATION AND ORDER using the CM/ECF system for filing and transmittal to all interested parties:

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